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FEB 27 2024

AT BALTIMORE
CLERK, U.S. DISTRICT COURT
DISTRICT OF MARYLAND

DEPUTY

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

BY

UNITED STATES OF AMERICA

v.

DARIC EVANS,

Defendant.

CRIMINAL NO.

RDB 24cr 58(Conspiracy to Obstruct Justice, 18
U.S.C. § 371)INFORMATION

INTRODUCTION

1. At all times material to this Information, the Defendant was employed as a correctional officer at the Eastern Correctional Institution, in Westover, Maryland (“ECI”).
2. On or about July 12, 2021, Samuel Warren, another correctional officer at ECI, unlawfully assaulted an inmate, K.K., in violation of 18 U.S.C. § 242.

COUNT ONE
(Conspiracy to Obstruct Justice)

The United States Attorney for the District of Maryland charges that:

On or about July 12, 2021, and continuing through in or about February 2023, in the District of Maryland, the defendant,

DARIC EVANS,

knowingly and willfully combined, conspired, and agreed with other correctional officers known and unknown to the United States to commit an offense against the United States. Specifically, the defendant and his co-conspirators agreed to commit the following offenses against the United States:

- (1) acting in relation to and in contemplation of a matter within the jurisdiction of the Federal Bureau of Investigation (“FBI”), an agency of the United States, to knowingly

destroy a record and tangible object—specifically, a video that contained evidence of Warren’s unlawful assault of K.K.—with the intent to impede, obstruct, and influence the investigation and proper administration of the matter, in violation of 18 U.S.C. § 1519; and (2) to knowingly engage in misleading conduct toward other people with the intent to hinder, delay, and prevent communication to a federal law enforcement officer and judge of information relating to the commission and possible commission of a federal offense—specifically, Warren’s unlawful assault of K.K.—in violation 18 U.S.C. §1512(b)(3).

Manner and Means of the Conspiracy

It was a part of the plan and purpose of this conspiracy that the Defendant, Warren, and other correctional officers at ECI would cover up evidence of the fact that Warren, while acting under color of law, had used unjustified and excessive force against K.K. during the July 12, 2021 assault, in an effort to protect Warren and the other officers who were present for the assault. The plan of the conspiracy was for the co-conspirators to destroy a video that contained evidence of the unlawful assault; to prepare false and/or misleading reports concerning the assault and the deletion of the video, and to submit those false reports to superiors at ECI; and to make false statements to anyone inquiring about the assault, including any law enforcement authorities such as the FBI.

Overt Acts

In furtherance of this conspiracy and to effect the object thereof, the Defendant and his co-conspirator(s), committed the following overt acts in the District of Maryland:

1. On or about July 12, 2021, the Defendant, Warren, and other ECI correctional officers who were part of the conspiracy met to discuss Warren’s use of force on K.K. The officers discussed the fact that a video recording of events following the assault—which included footage of K.K.’s visible injuries and K.K.’s accusation that Warren had assaulted him—did not look good

for Warren. The officers agreed that the video should be deleted and that, if asked, the officers would lie about the deletion. In keeping with this agreement, a correctional officer, D.Q., deleted the video recording of the events following Warren's assault of K.K.

2. In or about July 2021, the Defendant, Warren, and other ECI correctional officers who were part of the conspiracy submitted false and/or misleading reports to superiors at ECI concerning Warren's use of force against K.K. and/or the officers' response to that use of force.

3. In or about July 2021, and continuing through in or about May 2022, the Defendant, Warren, and other ECI correctional officers who were part of the conspiracy made false and/or misleading statements to state law enforcement authorities concerning Warren's use of force against K.K., the circumstances surrounding that use of force, and/or the disappearance of the video.

4. In or about August 2022 and continuing through in or about February 2023, the Defendant and other ECI correctional officers who were part of the conspiracy made false statements to a Special Agent of the FBI and other federal law enforcement personnel, and/or committed perjury before a federal grand jury, concerning Warren's use of force against K.K., the circumstances surrounding that use of force, and/or the disappearance of the video.

All in violation of Title 18, United States Code, Section 371.

Erek L. Barron
United States Attorney



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Sarah A. Marquardt
Assistant United States Attorney

Date: February 26, 2024